

Police Pension Schemes (England & Wales)

Advice on assumptions

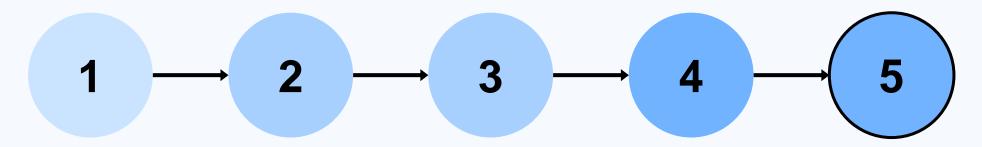
Actuarial valuation as at 31 March 2020

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30 October 2023



Assumptions setting process



GAD analyse experience data and prepare an initial set of recommended 'scheme-set' assumptions.

Details of our recommended assumptions can be found in Part B of this report.

GAD discuss recommended assumptions with Home Office. GAD discuss recommended assumptions with the Police Advisory Board for England and Wales.

The purpose of these discussions is to:

- Go through our recommended assumptions to make sure they are reasonable and appropriately reflect scheme experience.
- Provide an opportunity for stakeholders to highlight any relevant additional information they hold which could impact our recommendations.

Current

GAD present final recommended assumptions to the Home Secretary.

Home Secretary decides on the assumptions to be used in our calculations and informs GAD.

The Home Secretary has ultimate responsibility for setting the 'scheme-set' assumptions covered in this report, after considering GAD's advice.

The Home Secretary has decided to adopt all of the recommended 'scheme-set' assumptions set out in this report.

Highlights

Scheme-set assumptions				Our recommendations				
	Importance relative to scheme-set assumptions		Size of recommended changes		Impact of recommended changes on scheme costs			
Mortality after retirement		Most		Small	1	Higher costs		
Proportion commuted		Average		Medium	-	Lower costs		
Retirement ages		Average		Small	-	Lower Costs		
Rates of leaving service		Average		Large	-	Lower costs		
Promotional pay increases		Average		None	0	No impact		
Rates of ill-health retirement		Least		None	0	No impact		
Mortality before retirement		Least		None	0	No impact		
Family statistics		Least		None	0	No impact		

This table provides a summary of the scheme-set assumptions and their likely bearing on the valuation results. It is intended to highlight areas of potential focus to aid with the process of deciding on the 'scheme-set' assumptions to be adopted.

These assessments are indicative, rather than precise. More information on the approach used can be found in **Section B1**.

Be aware that several of the most important valuation assumptions do not appear in this table as they will be directed by HM Treasury. The impact of these 'directed' assumptions could be much greater than that of the impact of 'scheme-set' assumptions.

Advice on assumptions



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Any terms that appear in this report in underlined text are defined in the Glossary.

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Part A: Background



Introduction

Who is this report for?

This report is addressed to the Home Secretary. The Directions require the scheme actuary to carry out a robust analysis of the demographic experience of the scheme. The purpose of this report is to provide our analysis, advice and recommendations on the 'scheme-set' assumptions to be adopted for the actuarial valuation of the Police Pension Schemes (England & Wales) as at 31 March 2020 as required.

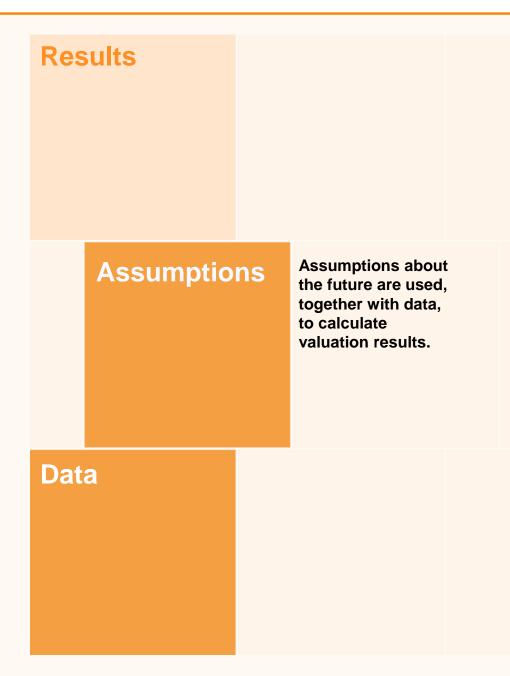
This report is intended to help the Home Secretary:

- understand the key assumptions about the future that need to be made in order to carry out the valuation
- understand the impact those assumptions can have on the valuation results
- decide on the 'scheme-set' assumptions to be adopted.

Why are assumptions important?

Assumptions are estimates of uncertain variables needed to carry out the actuarial valuation of the Police Pension Schemes (England & Wales) as at 31 March 2020, in accordance with HM Treasury <u>Directions</u>.

The results of the valuation are critically dependent on the assumptions adopted. If what actually happens in the future turns out to be significantly different to these assumptions, employers could end up having over- or under-paid contributions, or benefit changes could be made when they otherwise wouldn't be.



Types of assumptions

What assumptions are needed?

There are 2 main types of assumption:

- **Demographic assumptions.** These focus on member characteristics and help to determine when and for how long benefits are expected to be paid.
- Financial assumptions. These focus on financial factors and help to determine how much is expected to be paid to members.

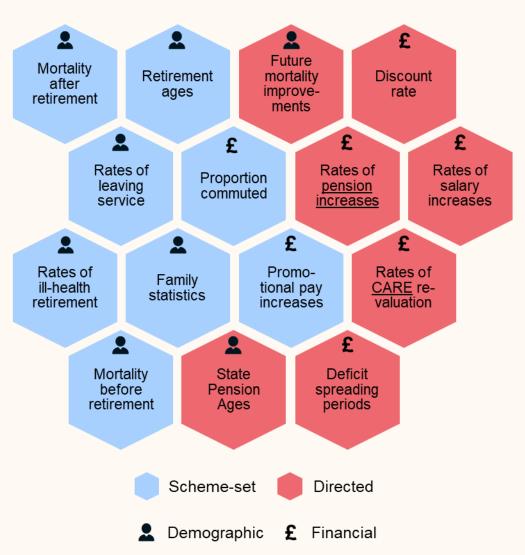
Together these assumptions determine how much needs to be set aside now, in order to meet future payments.

Who is responsible for assumptions?

There are 2 parties responsible for setting assumptions:

- The Home Secretary, who is responsible for setting 'scheme-set' assumptions (after taking actuarial advice). These are usually demographic assumptions.
- HM Treasury, who are responsible for setting 'directed' assumptions through legislation. These are usually financial assumptions.

In this report we focus on 'scheme-set' assumptions, but directed assumptions are included for context. Directed assumptions are shown in Appendix C1.



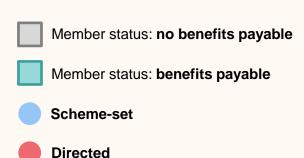
Demographic assumptions

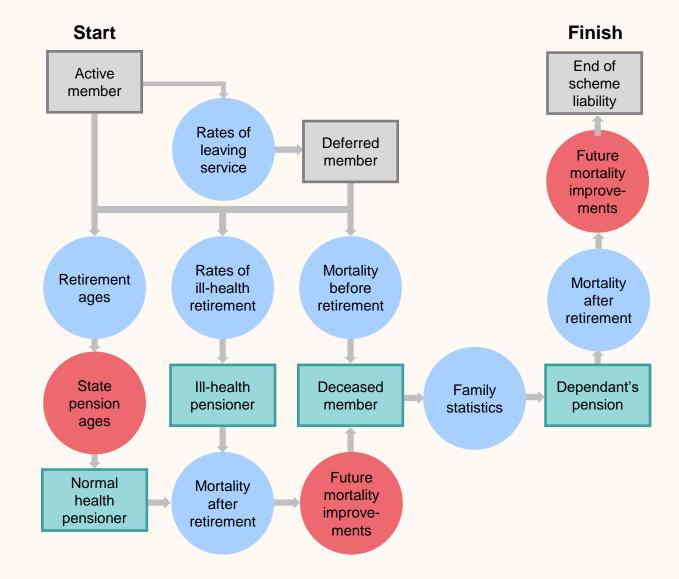
How are the assumptions used?

Demographic assumptions are used to predict what will happen to the status of members in the future, until their liability in the scheme is extinguished.

The chart to the right shows a simplified set of paths that an active member could follow. Demographic assumptions (shown in circles) are used to determine the likelihood that the member follows any given path.

Most demographic assumptions are set by the scheme, rather than directed by HM Treasury.





Financial assumptions

How are the assumptions used?

Financial assumptions are used to predict:

- the size of future benefits due to members
- the current cost of those benefits to the scheme.

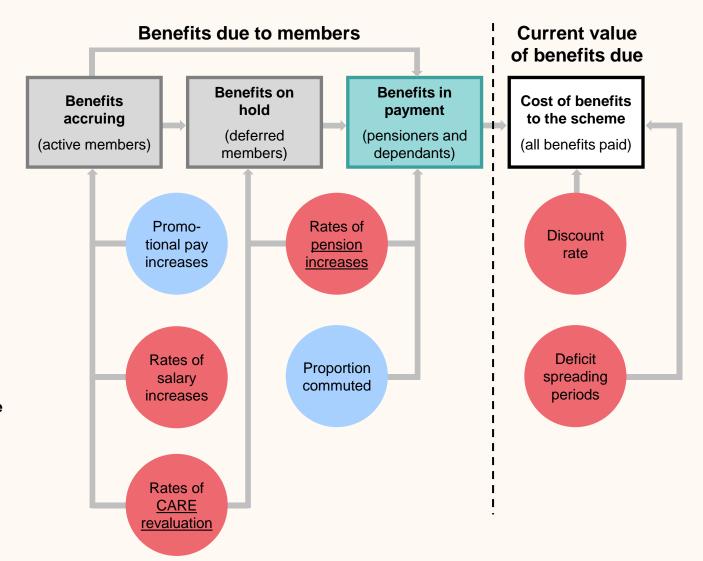
The chart to the right shows a simplified summary of how these assumptions are applied.

The only financial assumptions set by the scheme are:

- · promotional pay increases
- · commutation proportions.
- Member status: no benefits payable

 Member status: benefits payable

 Scheme-set
- Directed



Setting assumptions

How are the assumptions decided?

We recommend 'scheme-set' assumptions after considering all relevant information. The picture to the right summarises the 3 main inputs.

The Home Secretary then decides on the 'scheme-set' assumptions to be adopted, after considering GAD's advice.

What rules need to be followed?

HM Treasury <u>Directions</u> specify that 'scheme-set' assumptions must be the Home Secretary's best estimates of future experience. This means they cannot include any margins for prudence or optimism.

The Directions also require that assumptions must consider:

- · previous valuation assumptions
- an analysis of demographic experience, where there is enough data to perform such an analysis
- any other relevant data, including anything that only became available after the date of the valuation
- Any emerging evidence about historic or expected future long-term trends.



The assumptions are required to be best-estimate, including an allowance for expected future GDP growth and life expectancy progression.

In our Valuation Results report dated 30 October 2023 we also consider three future climate scenarios; their potential impact on valuation assumptions; and how these in turn might impact on the cost of future benefits payable from the scheme.

Impact on employer contribution rates

Which assumptions are most important for setting employer contribution rates?

The chart to the right shows the importance of each assumption on <u>employer contribution rates</u>, relative to that of other assumptions. This shows that:

- there is a large degree of variation in the significance of each assumption
- the more significant assumptions tend to be directed by HM Treasury.

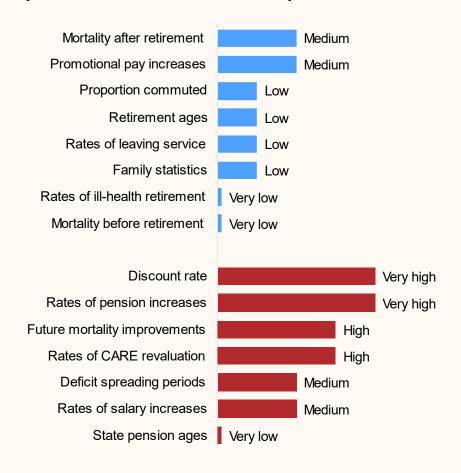
For example, the discount rate is shown as very highly significant compared to mortality before retirement. This means that even if the discount rate changes by a small amount, the impact on employer contribution rates could be very large compared to a fairly large change in mortality before retirement.

For context, the <u>employer contribution rate</u> is currently 31.0% of pensionable pay. In monetary terms, this was equivalent to employer contributions of £1.4 billion in 2020-21.

The rankings shown are approximate and are based on the relative significance of each assumption only. They are intended as an illustration and are not a prediction of potential future changes.

This comparison considers all assumptions and therefore differs to the earlier Highlights summary and the later Summary statistics.

Importance relative to all assumptions





Impact on the scheme's cost cap cost

Are the same assumptions important for calculating the cost cap cost?

The significance of each assumption on the <u>cost cap cost</u> can be very different to the significance of the same assumption on <u>employer contribution rates</u>. This is because the cost cap process was designed to exclude certain costs.

The chart to the right shows the significance of each assumption on the <u>cost cap cost</u> of the scheme, which itself tends to be lower than the <u>employer contribution rates</u>. This excludes the effect of the economic check.

It's important to be aware that even a small change in an assumption with low significance could result in cost cap thresholds being breached and member benefits being adjusted.

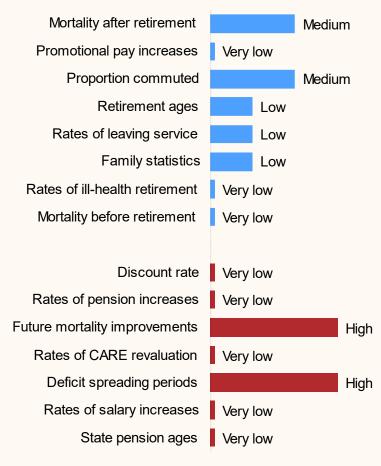
The main differences when compared to the significance of assumptions on the <u>employer contribution rate</u> are:

- Most financial assumptions, such as the discount rate, are not very significant to the <u>cost cap cost</u>
- The significance of directed assumptions (relative to 'schemeset' assumptions) tends to be lower for the <u>cost cap cost</u> than for <u>employer contribution rates</u>.

For context, the current target cost of the scheme is 12.8% of pensionable pay.

As before, the rankings shown are approximate and are intended as an illustration, not a prediction of potential future changes.

Importance relative to all assumptions





Limitations

Data

In preparing this report, GAD has relied on data and other information supplied by the individual police forces or via their appointed administrators, as described in our report titled 'Membership data', dated 30 October 2023. The limitations set out in that report apply equally to this report.

Unless stated otherwise, all data adjustments mentioned in that report apply equally to the data used for setting assumptions. Any additional data adjustments made solely for the purpose of setting assumptions are detailed in this report.

Assumptions

We have used the data provided to analyse the scheme experience and develop our recommended assumptions.

When considering appropriate assumptions, experience usually provides the most reliable evidence.

However, robust analysis of scheme experience will only be possible where there is both sufficient quality, and quantity, of data. The level of reliance that can be placed on assumptions derived from the analysis will also vary depending on these two factors.

Our recommended assumptions are long term and are not suitable for predicting short term future experience.

Sharing

This report has been prepared for the use of the Home Secretary and the Home Office. This report will be published as part of completing the 2020 valuation of the scheme, and we are content for the Home Secretary to release this report to third parties, provided:

- It is released in full
- The advice is not quoted selectively or partially;
- · GAD is identified as the source of the report, and;
- · GAD is notified of such release.

Other than the Home Secretary and the Home Office, no person or third party is entitled to place any reliance on the contents of this report, except to any extent explicitly stated herein. GAD has no liability to any person or third party for any action taken or for any failure to act, either in whole or in part, on the basis of this report.

Compliance statement:

This report has been prepared in accordance with the applicable Technical Actuarial Standards: TAS 100 and TAS 300 issued by the Financial Reporting Council (FRC). The FRC sets technical standards for actuarial work in the UK.

Part B: Recommendations



B1. Summary



Summary statistics

Scheme-set assumptions	Assumption info	ormation	Our recommendations
	Importance relative to scheme-set assumptions	Volatility of experience and unreliability of data	Size of recommended Impact of recommended change changes on scheme costs
Mortality after retirement	Most	Low	Small Higher costs
Proportion commuted	Average	Medium	Medium Lower costs
Retirement ages	Average	Low	Small Lower costs
Rates of leaving service	Average	Low	Large Lower costs
Promotional pay increases	Average	High	None No impact
Rates of ill-health retirement	Least	Low	None No impact
Mortality before retirement	Least	Low	None No impact
Family statistics	Least	Medium	None No impact

This table provides a summary of the 'scheme-set' assumptions and their likely bearing on the valuation results. It is intended to highlight areas of potential focus to aid with the process of deciding on the 'scheme-set' assumptions to be adopted.

These assessments are indicative, rather than precise. More information on the approach used can be found the next page.

Be aware that several of the most important valuation assumptions do not appear in this table as they will be directed by HM Treasury. The impact of these 'directed' assumptions could be much greater than that of the impact of 'scheme-set' assumptions.

Likely to be no material impact on

the ECR or CCC.

Interpretation of summary statistics

that doesn't tend to change

much.

Size of recommended Importance relative Volatility of experience Impact of recommended and unreliability of data changes on scheme costs to scheme-set assumptions changes What The importance of this assumption The variability of experience The size of change we The likelihood of our and unreliability of data on employer contribution rates recommend, relative to the recommendations leading to higher does it (ECR) and the cost cap cost observed in the past. This assumptions used at the or lower employer contribution rates show? (CCC) of the scheme, relative to can impact the weight we last valuation. (ECR) and cost cap cost (CCC) of other 'scheme-set' assumptions place on current experience. the scheme What is Our actuarial judgement and the Public service pension Assumptions recommended Our actuarial judgement and the sensitivity analysis carried out at scheme experience at at this valuation and those sensitivity analysis carried out at it based the last valuation. used at the last valuation. the last valuation. previous valuations on? What Most High Large Higher are the An assumption that could A current or previous lack of An average change in ECR and CCC likely to be higher. possible assumption of over 25%. plausibly impact the ECR or CCC credible data, or large Lower ratings? by more than 1%. changes in member Medium ECR and CCC likely to be lower. behaviour. **Average** An average change in Uncertain Medium An assumption with an impact in assumption of between Likely impact on the ECR and CCC between most and least. Volatility of experience or 10% and 25%. unreliability of data classified is still uncertain. For example, if Small or None Least assumptions for different categories in between high and low. An assumption that could An average change in move in different directions. Low plausibly impact both the ECR assumption of between 0% No impact and the CCC by less than 0.2%. A large pool of credible data and 10%.

Significance, volatility and size of changes

The diagram to the right shows, for each assumption:

- · Relative importance of assumption. It's important to pay regard to the more significant assumptions, as any changes can have a big impact. Assumptions placed higher up the page are those that are more significant.
- Volatility of experience and unreliability of data. Assumptions placed further to the right of the page are also important to consider, as they are more volatile or have uncertain experience. This means that they are more likely to change substantially.
- Size of recommended changes. Larger changes are key as they are more likely to have a large impact on valuation results (although this also depends on how the significant the assumption is). The coloured circles signify the size of our recommended change, as specified in the key below.

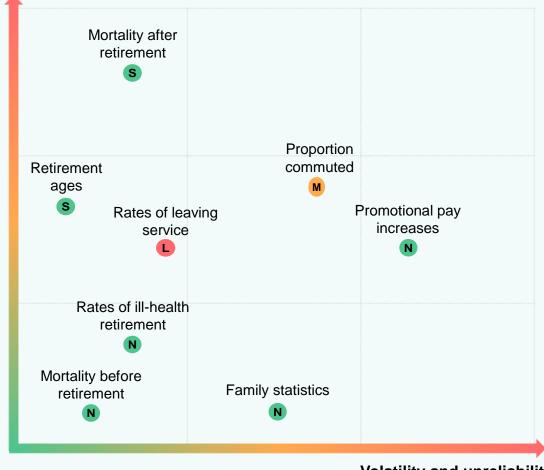
Key: Size of recommended changes

Large

M Medium S Small

N None

Importance



B2. Mortality after retirement



Mortality after retirement

What does this assumption represent?

Mortality assumptions are a series of probabilities which represent the likelihood of a member dying at any given age. Different assumptions usually apply to different groups, e.g., for males and females, or normal health or ill-health retirees.

Baseline mortality rates are a 'scheme-set' assumption and are the focus of this section.

Future mortality improvements are a directed assumption, and typically act to reduce baseline mortality rates in future years. They directed to be in line with the improvements underlying the ONS-2020 population projections, which reflect the latest views on the long-term effect of the COVID-19 pandemic. The rate of improvements can be negative.

Summary statistics

Relative importance of assumption

Volatility of experience and unreliability of data

Size of recommended changes on scheme costs

Most

Low

Small

Higher costs

Our recommendations and rationale

We recommend updating the baseline mortality rates for male normal health and current ill health pensioners and for female dependants, using an equal allowance for recent experience and the 2016 assumption to help smooth out volatility.

Due to limited experience, for male dependants and female pensioners, we recommend setting the percentage adjustment to the standard tables to give the same change in life expectancy as that for the opposite sex members. This is a change in the approach used for the 2016 valuation.

We recommend adopting the same baseline mortality assumption for future ill health pensioners as that for current ill health pensioners. This differs from the 2016 valuation.

The ONS-2020 population projections allow for the impact of the COVID-19 pandemic, so it would be inappropriate to adjust the baseline mortality assumptions.

Baseline mortality rates are set by adjusting the 'S3' standard mortality tables issued in December 2018 by the Continuous Mortality Investigation (CMI). These tables are derived from a larger amount of public service data, and so are more appropriate for the scheme than the S2 tables adopted at the 2016 valuation. There is a known issue with the unadjusted 'S3' standard tables over-estimating life expectancy. However, our approach of fitting the tables to the scheme's experience negates this issue.

Practical implications

Mortality assumptions can be used to estimate the life expectancy of individual members. Higher life expectancies mean a higher cost of providing benefits, as benefits must be paid for longer periods of time.

The table below shows the impact of our recommended assumptions. For each category shown:

- The **first column** for males and females is the assumption adopted for the 2016 valuation.
- The **middle column** for males and females is the 2016 assumption, but updated to use a valuation date of 2020 and ONS-2020 improvements.
- The last column for males and females is the assumption we recommend for the 2020 valuation.

The changes between the first and middle columns show the impact of directed changes to future mortality improvements and the normal passage of time. The changes between the middle and last columns show the impact of our recommended changes to baseline mortality assumptions.

All numbers shown are cohort life expectancies that have been calculated allowing for future mortality improvements.

Life expectancies for normal health pensioners

	Males			Females			
	2016 valuation assumption	2016 assumption updated	2020 valuation recommendation	2016 valuation assumption	2016 assumption updated	2020 valuation recommendation	
Current pensioners, age 55	87.3	86.3	86.4	89.0	88.1	88.2	
Future pensioners, age 40	88.9	87.7	87.7	90.5	89.5	89.5	

Recommendations in detail

		2016 Assumptions			2020 Recommendations			
Category		Standard table	Adjustment	Based on	Standard table	Adjustment	Based on	
Normal health Male		S2NMA	104%	Scheme experience	S3NMA	107%	Scheme experience	
Pensioners	Female	S2NFA	104%	Scheme experience	S3NFA	115%	Scheme experience	
Current ill- health Pensioners	Male	S2NMA	142%	Scheme experience	S3NMA_H	105%	Scheme experience	
	Female	S2NFA	142%	Scheme experience	S3NFA_H	121%	Scheme experience	
Future ill- health Pensioners	Male	S2IMA	100%	Scheme experience	S3NMA_H	105%	Scheme experience	
	Female	S2IFA	100%	Scheme experience	S3NFA_H	121%	Scheme experience	
Dependants	Male	S2NMA	103%	Scheme experience	S3DMA	78%	Scheme experience	
	Female	S2NFA	103%	Scheme experience	S3DFA	99%	Scheme experience	

Our approach

Analysis

We have analysed the scheme's mortality experience over the period 1 April 2016 to 31 March 2020.

Our analysis has been carried out on an 'amounts' basis (as opposed to a 'lives' basis).

An 'amounts' analysis gives more weight to members with larger pensions, better reflecting the impact they have on scheme costs. A 'lives' analysis on the other hand gives an equal weighting to every member being analysed.

As members with higher pensions tend to live longer, an 'amounts' analysis usually results in lighter mortality assumptions than a 'lives' analysis would, based on the same data.

Setting recommended assumptions

We recommend that all baseline mortality assumptions are based on the 'S3' series of standard tables.

Our general approach is:

- Identify groups of members we would expect to have different life expectancies, for example by gender and by health at retirement.
- Identify the most appropriate 'S3' table for each group. Where we have enough scheme experience, we carry out a series of statistical tests to find tables which best fit recent experience. This is approximate, so we apply judgement to select the most appropriate table.
- The last four years of experience may not accurately reflect the longer-term, so we generally 'smooth out' any excess volatility by setting adjustments based on an equal allowance for recent experience and the 2016 valuation assumptions, which were set using pre-2016 experience.
- Where there is not enough scheme experience, we look at assumptions from other groups of members or other schemes which may have similar experience, adjusted to allow for any available information.

We have analysed male pensioner and dependant experience and female dependant experience. There is insufficient data to carry out a credible analysis for male dependants or female pensioners.

The movement data has been excluded for some forces, representing around 7% of pensioner and 18% of dependant movement records. The data has also been adjusted for Surrey and Metropolitan forces to adjust pension increases in the movement data.

Scheme experience: overall

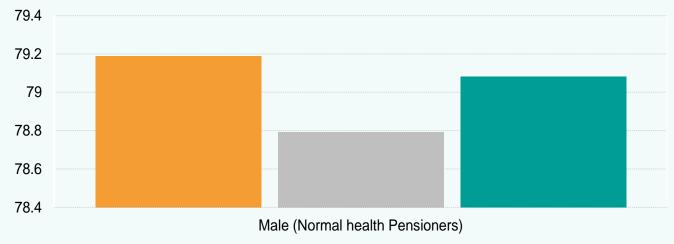
Experience versus expectations show how accurate the assumptions have been in the past and can help inform setting future assumptions.

The chart to the right and those on the following pages compare:

- actual experience () on the left what has happened over the last 4 years.
- 2016 assumptions () in the middle – what we thought would happen, based on the baseline mortality assumptions adopted for the 2016 valuation. Uses ONS-2020 mortality improvements.
- 2020 recommendations () on the right – what we would have expected to happen, had our recommended baseline mortality assumptions been adopted for the 2016 valuation. Uses ONS-2020 mortality improvements.

It should be noted that experience can be a very volatile measure for groups with small amounts of data, which then impacts the reliance we place on it.

Experience vs expectations: average age at death



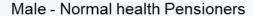
Summary

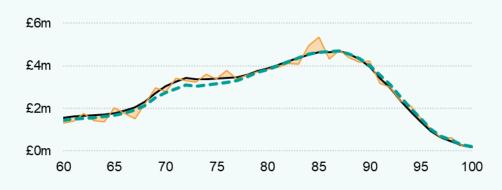
The 2016 assumptions and the 2020 recommendations are largely in line with the baseline mortality experience. This can be seen through the average age at death on the chart above and the distribution of deaths by age shown on the next page.

Updating the baseline mortality assumption has a relatively small effect on the life expectancies, shown on the earlier practical implications page, which have reduced overall due to directed future mortality improvements.

Scheme experience: in detail

Pension ceasing as a result of death by age, split by category

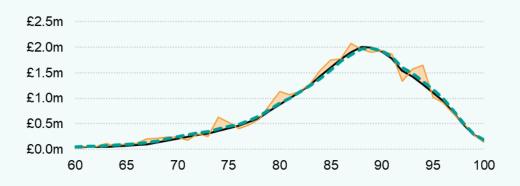




Male - III-health Pensioners



Female - Dependants



Scheme experience: in numbers

Category		Experience Actual pension ceasing due to death over 2016-2020	2016 Expectations Pension expected to cease under the 2016 assumptions	Experience ÷ 2016 Expectations	2020 Expectations Pension expected to cease under the 2020 recommendations	Experience ÷ 2020 Expectations
Normal health Pensioners	Male	£121.6 m	£122.7 m	99.1%	£120.7 m	100.7%
III-health Pensioners	Male	£35.9 m	£35.6 m	100.8%	£35.5 m	101.1%
Dependants	Female	£33.9 m	£32.1 m	105.5%	£32.9 m	102.8%

There was around £5m of pension ceasing due to death over 2016-2020 for female normal and ill-health pensioners and around £0.1m for male dependants. This was insufficient to produce a robust analysis and therefore we have not included any output in the table above.

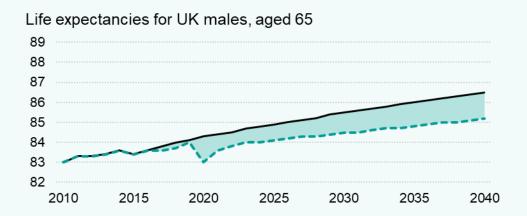
Wider environment: COVID-19

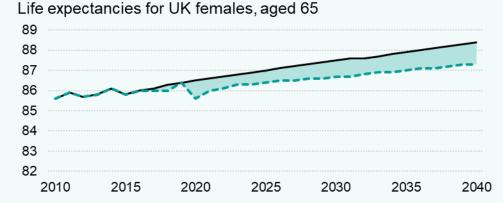
No explicit allowance has been made for the COVID-19 pandemic in our recommended assumptions for **baseline mortality rates**. Our recommendations are based on scheme experience up to 2020 so will only have included deaths from the very start of the pandemic. We do not expect these deaths to have had a material impact on our recommendations.

However, an explicit allowance is included in assumed **future mortality improvements**. These are directed to be in line with the improvements underlying the ONS-2020 population projections.

When deriving the ONS-2020 projections, a panel of mortality experts gave their views on the impact of COVID-19 pandemic on mortality rates in the short term. Based on this, short term adjustments were made to the 2019 to 2024 period to allow for estimated deaths in 2021 and an averaging of the experts' views on estimated improvements by age group over this period. Long term rates of future mortality improvement are not projected to change as a result of COVID-19.

The charts on this page show the impact of the ONS-2020 projections on future life expectancies for a typical UK male and UK female, aged 65. There is a clear drop in life expectancies in 2020 as result of the COVID-19 pandemic. In the longer term, even though mortality is expected to start improving again, the 2020 drop means we start from a lower baseline and the impact of COVID-19 will be with us long into the future.





adopted for the 2016 valuation

Key:

Based on **ONS-2020 projections** (dotted line) and difference from the 2016 projections (shaded area)

Based on ONS-2016 projections, which were

B3. Proportion commuted



Proportion commuted

What does this assumption represent?

The proportion commuted represents the fraction of pension that members give up at retirement, in return for a single tax-free lump sum payment (subject to HMRC tax limits).

Commutation is a 'scheme-set' assumption for this valuation. In the 2016 valuation, it was 'scheme-set' for some groups of members and directed for other groups.

The proportion commuted is an important assumption because the value of the lump sum received is often less than the value of the pension given up. Higher proportions commuted therefore tend to lead to lower scheme costs.

The lump sum is typically calculated using a commutation rate of £12 lump sum for every £1 of annual pension given up. The commutation rate is not being reviewed in this valuation.

Summary statistics

Relative importance of assumption

Volatility of Size of recommended changes on scheme costs

Average

Nolatility of Size of recommended changes on scheme costs

Medium

Medium

Lower costs

Our recommendations and rationale

1987 Scheme: Commutation is offered on actuarially equivalent terms. Valuation of the benefits would be the same whether or not allowance was made for members exercising them. Therefore, for simplicity we recommend continuing to make no allowance i.e. assume 0%.

2006 Scheme: Members receive an automatic lump sum but have the option to exchange some of this for higher annual pension payments on actuarially equivalent terms. Valuation of the benefits would be the same whether or not allowance was made for members exercising them. Therefore, for simplicity we recommend continuing to make no allowance i.e. assume 0%.

2015 Scheme: There are too few 2015 scheme retirements to set an assumption based on experience. Therefore, we have considered the average experience from other large public service schemes. This has shown higher commutation proportions commuted since 2016.

Mixed 1987/2015 Scheme: We recommend increasing the proportion commuted from 8.75% to 12% of their 2015 Scheme pension. This is based on 60% of the average experience from other large public service schemes.

Mixed 2006/2015 Scheme and 2015 Scheme: We recommend increasing the proportion commuted from 17.5% to 20% of their 2015 pension. This is based on the average experience from other large public service schemes.

Practical implications

Commutation can drastically alter the timing and amount of benefit payments for individual members.

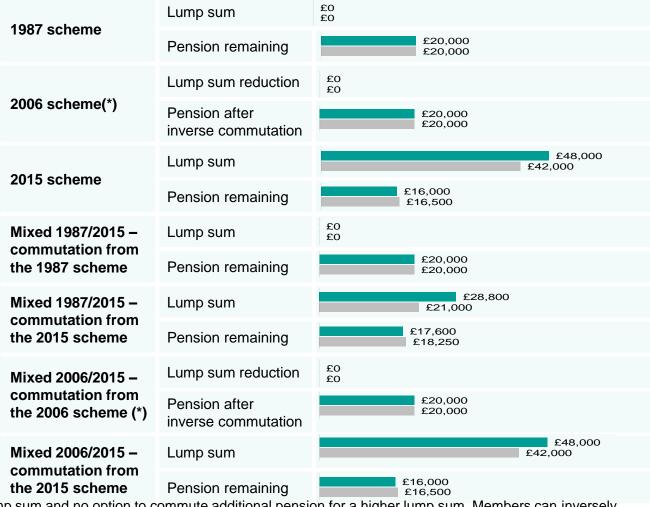
Members choose whether to commute based on their own individual circumstances. For example, their:

- Assessment of their future life expectancy
- · Tax circumstances
- Preferences for higher future income vs an immediate lump sum.

The chart to the right shows the impact on assumed benefits of our recommended assumptions. For each category shown:

- The top line () shows the impact of the assumptions we recommend for the 2020 valuation.
- The bottom line () shows the impact of the assumptions adopted for the 2016 valuation.





^{*} The 2006 Scheme offers an automatic lump sum and no option to commute additional pension for a higher lump sum. Members can inversely commute their lump sum for higher annual pension payments on cost neutral terms compared to the valuation assumptions.

Our approach

Analysis

For 2015 Scheme members, we have insufficient data to carry out a credible analysis using the scheme's own data. Therefore, we have used the analysis carried out on the large public service pension schemes commutation experience over the period 1 April 2016 to 31 March 2020.

Our analysis considered total pension that came into payment and total pension that was commuted and was carried out separately for groups expected to behave differently.

This approach places more weight on members with larger pensions, reflecting the bigger impact they can have on scheme costs.

Setting recommended assumptions

Our general approach is:

- Identify groups of members we would expect to commute in different ways, for example by gender, pension amount and scheme section.
- Compare recent commutation experience against the 2016 valuation assumptions.
- Where there is not enough scheme experience, we look at assumptions from other groups of members or other schemes which may have similar experience, adjusted to allow for any available information
- Recommend a change to the assumption only if evidence points to a material change to the valuation results. In these cases, our recommendation is to fully align the assumption to recent experience, as there is limited evidence for in-year volatility.
- We make no explicit allowance for HMRC limits, which already influence member behaviours, or for the McCloud judgment as this is unlikely have a significant impact on members' commutation choices.
- For the 1987 Scheme (which has commutation factors offered at cost neutral rates compared to the valuation assumptions) and the 2006 Scheme (which offers an automatic lump sum with inverse commutation rates which are cost neutral compared to the valuation assumptions) we will set the proportion commuted to be 0% as we expect there to be little impact on the cost of the scheme. Due to cost neutrality, we have not carried out any analysis of commutation experience from these schemes.

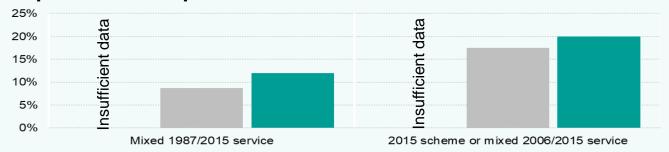
Scheme experience: overall

Experience versus expectations show how accurate the assumptions have been in the past and can help inform setting future assumptions.

- actual experience () on the left what has happened over the last 4 years.
- 2016 assumptions () in the middle what we thought would happen, based on the assumptions adopted for the 2016 valuation.
- 2020 recommendations (
 on the right what we would have expected to happen, had our recommended assumptions for the 2020 valuation been adopted for the 2016 valuation.

It should be noted that experience can be a very volatile measure for groups with small amounts of data, which then impacts the reliance we place on it.

Experience vs expectations



Summary

The charts above show the expected commutation from the 2015 scheme for members in the two groups.

There are too few 2015 scheme retirements to carry out a robust analysis. Therefore, the proposed assumptions are based on the average experience from large public service pension schemes, which has shown higher proportions commuted since 2016.

For members with mixed 1987/2015 scheme service, we based our proposed 2015 scheme commutation assumption on 60% of the average experience from the large public service schemes over 2016 to 2020. Details on the rationale for this can be found on page 35.

For members with mixed 2006/2015 scheme service or only 2015 scheme service, we based our proposed 2015 scheme commutation assumption on the average experience from the large public service schemes over 2016 to 2020.

Scheme experience: in numbers

Category	Scheme Pension Commuted From	Total pension coming into payment over 2016-2020 (before commutation)	Total pension commuted over 2016-2020	Experience Proportion of pension commuted over 2016-2020 (weighted by pension amount)	2016 Expectations Proportion of pension expected to be commuted under the 2016 assumptions	2020 Expectations Proportion of pension expected to be commuted under the 2020 assumptions
1987 Scheme Only	1987	N/A	N/A	N/A	0%	0%
2006 Scheme Only	2006	N/A	N/A	N/A	0%	0%
	1987	N/A	N/A	N/A	0%	0%
Mixed 1987/2015	2015	N/A	N/A	N/A	8.75%	12%
Mixed 2006/2015	2006	N/A	N/A	N/A	0%	0%
	2015	N/A	N/A	N/A	17.5% (**)	20%
2015 Scheme Only	2015	N/A	N/A	N/A	17.5% (**)	20%
Other large public service schemes (*)	N/A	£255 m	£50 m	19.6%	17.5% (**)	20%

There were 825 retirements with mixed 1987/2015 scheme benefits and a further 915 retirements, but it is not clear from the data if these are mixed 2015 scheme group retirements or solely 2015 scheme retirements. This data is insufficient to produce a robust analysis. Therefore, we have not included any output in the table above. In the 1987 scheme, analysis is not required due to cost neutrality of commutation factors.

In the 2006 scheme, analysis is not required due to cost neutrality of inverse commutation factors.

^{*} Other large public service schemes data includes data from the National Health Service Pension Scheme (England and Wales) – 2008 section, Civil Service Pension Scheme (GB) – Non-Classic schemes, Teachers' Pension Scheme (England and Wales) – NPA 65 section and Local Government Pension Scheme (England and Wales) – Post 2008 section.

^{**} This assumption was previously HMT directed at the 2016 valuation.

1987/2015 Mixed service: Approach

2016 Valuation Analysis

For the 2016 valuation, it was assumed members with both 1987 and 2015 Scheme benefits:

- •commute 0% of their 1987 Scheme pension for cash.
- •commute 8.75% of their 2015 Scheme pension for cash.

The terms available in the 1987 Scheme offer a significantly greater lump sum than would be available under the commutation terms of 12:1 offered in the 2015 Scheme. We would expect this to act as a disincentive to commute pension in the 2015 Scheme, especially for those members with significant amounts of service in the legacy scheme. As such, we would not expect that these members will commute significant amounts of their pension from the 2015 Scheme.

However, there was some evidence to suggest that a number of members of the 1987 Scheme commute pension above the HMRC tax limits. This tax charge can happen because members can commute 25% of pension (generally) and the commutation factors are higher than 20 at some ages. This suggests that members will commute additional pension when the effective terms (after tax) of that additional commutation are much less favourable than for the bulk of the pension they can commute

It was therefore recommended that members with 1987 and 2015 Scheme benefits should be assumed to commute 8.75% of their 2015 Scheme pension, which was half of the 2016 valuation assumption for new entrants to the 2015 Scheme (i.e. 17.5%).

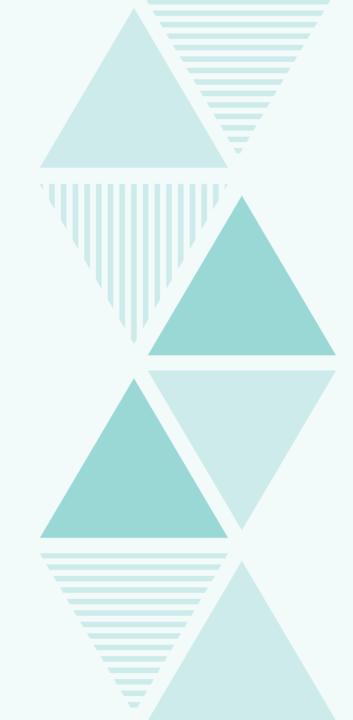
2020 Valuation Analysis

We have analysed retirements over 2016 to 2020 for Police Pension Schemes (England & Wales) 1987 members. This analysis showed that around 70% of members incurred a tax charge when commuting pension for cash. We recognise that there is some uncertainty over the application of this approach to the commutation assumption. In addition, this proportion may also change over time, particularly as an increasingly significant tranche of benefit will come from the 2015 scheme. However, members do not always make rational financial decisions when it comes to the lump sum. For example, many take the maximum lump sum regardless of the terms.

Therefore, to reflect the data analysis, but also the uncertainty in this approach, we recommend updating the assumption in relation to the amount of 2015 pension members with 1987 and 2015 scheme benefits commute for cash. We recommend assuming such members commute 60% (from 50%) of the assumption for new entrants to the 2015 Scheme. This makes broadly equal allowance for recent experience and the 2016 valuation assumptions.

This leads to the recommendation assumption that these members will commute 12% of their pension (i.e. 60% of the assumption for new entrants to the 2015 Scheme, which is now 20%).

B4. Retirement ages



Retirement ages

What does this assumption represent?

Retirement age assumptions are a series of probabilities which represent the likelihood of a member retiring and claiming their pension at any given age.

Different assumptions usually apply to groups who are expected to behave differently, e.g., for members with different Normal Pension Ages.

Retirement age affects:

- · The benefits members receive e.g. earlier retirement ages for active members means lower benefits, as members will have built up those benefits over a shorter period of time.
- · The length of time benefits will be paid for – although in most schemes this impact is offset by early retirement reductions and late retirement uplifts.

Summary statistics Volatility of Size of Impact of recommended experience and Relative importance of recommended

Average

assumption

Low

unreliability of data

change Small changes on scheme costs

Lower costs

Our recommendations and rationale

1987 Scheme: For the 2016 valuation, separate expected retirement rates applied to members who were transitionally protected (including taper protected) and those who were unprotected.

- For the Protected members, we recommend no changes to the existing retirement rates selected for the 2016 valuation, as these were closely aligned with recent scheme experience.
- For Unprotected members, our expectation is that the McCloud judgment will result in these members exchanging up to 7 years' service from the 2015 scheme to the 1987 Scheme. However, we understand that forces are promoting 'retire and return' to Police Officers which enables 1987 Scheme members to access their pension lump sum once they are eligible to retire from the 1987 scheme whilst returning to remain in the 2015 Scheme for future service. We expect this to influence member behaviour significantly, with members selecting this option and staying in service until age 55 where they can then retire from active status on preferential terms. Therefore, we recommend assuming two retirement assumptions for unprotected 1987 scheme members: the protected member assumption for the lump sum (pension abated until full retirement) and retirement at age 55 for 2015 Scheme benefits.

2006 Scheme: Due to insufficient experience data, it is not possible to carry out robust scheme experience analysis against this assumption. We have no reason to believe the existing assumption is no longer appropriate and so, we recommend no change to this assumption.

2015 Scheme: Due to insufficient experience data, it is not yet possible to test the suitability of the 2015 scheme assumption. We have no reason to believe the existing assumption is no longer appropriate and so, we recommend no change to the existing assumption.

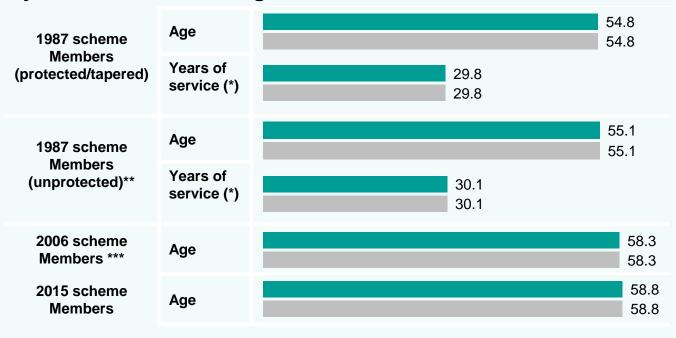
Practical implications

The chart to the right shows the impact of our recommended assumptions. For each category shown:

- The top line () shows the impact of the assumptions we recommend for the 2020 valuation.
- The bottom line () shows the impact of the assumptions adopted for the 2016 valuation.

The numbers shown in this example assume that members retire from active service. No allowance is made for the possibility of ill-health retirement, leaving service before retirement, or death in service. These assumptions are covered in other sections.

Expected retirement age / years of service for a member who joined the scheme at age 25



^{*} The years of service bars represent the numbers of years between joining and retirement (the number of years a member has worked).

^{**} The age/service that the member is expected to retire based on 1987 unprotected assumptions without any allowance for retire and rejoin.

^{***} We do not distinguish between protected and unprotected 2006 scheme members.

Our approach

Analysis

We have analysed the scheme's retirement experience over the period 1 April 2016 to 31 March 2020.

This analysis is based on active members of the scheme. Deferred members are not analysed and assumed to retire at the <u>Normal Pension Age</u> for deferred members.

Setting recommended assumptions

Our general approach is:

- Identify groups of members we would expect to have different retirement patterns, for example by gender and scheme section.
- Compare recent retirement experience against the 2016 assumptions.
- Where there is not enough scheme experience, we look at assumptions from other groups of members or other schemes which may have similar experience, adjusted to allow for any available information.
- Recommend that the assumption is updated only if evidence points to a material change to the valuation results.
- We typically only recommend a change to the assumed number of retirements, leaving the age profile of the existing assumption unaltered. We only recommend a change to the age profile if we see evidence of a material and non-temporary step change in membership behaviour.
- The last four years of experience may not accurately reflect the longer-term, so if we recommend a change we generally 'smooth out' any excess volatility by basing our recommendation on an equal allowance for recent experience and the 2016 valuations assumptions, which were in turn set using pre-2016 experience.

There were 5 forces excluded from the analysis, and this meant that the analysis was carried out on around 93% of active records.

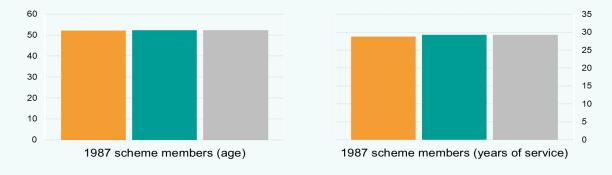
Scheme experience: overall

Experience versus expectations show how accurate the assumptions have been in the past and can help inform setting future assumptions.

- actual experience () on the left what has happened over the last 4 years.
- 2016 assumptions () in the middle – what we thought would happen, based on the assumptions adopted for the 2016 valuation.
- 2020 recommendations ()
 on the right what we would have expected to happen, had our recommended assumptions for the 2020 valuation been adopted for the 2016 valuation.

It should be noted that experience can be a very volatile measure for groups with small amounts of data, which then impacts the reliance we place on it.

Experience vs expectations: average retirement ages and years of service



Summary

The average age and service of recent retirements are close to the 2016 assumptions, as shown above.

The number of retirements in the 1987 Scheme is also close to the 2016 assumptions, as shown on the next page.

There is insufficient information to test the impact on the 2006 Scheme, 2015 scheme or unprotected 1987 scheme members in isolation. Though as we set out in our recommendations, we expect the unprotected 1987 members' behaviour to be affected by the McCloud judgment and the retire and return policy.

Scheme experience: in detail

Number of retirements by age and years of service, for members with accrued pension in the specified scheme, split by category



^{*} The 1987 scheme members (protected/tapered) experience reflects retirement ages 48 to 60 and service of 20 to 35 years and includes 13,470 protected members, 197 tapered members and 23 unprotected members.

Scheme experience: in numbers

Category		Data Number of retirements over 2016-2020	Experience Average service / age at retirement for retirements over 2016-2020	2016 Expectations Expected average service / age at retirement under the 2016 assumptions	2020 Expectations Expected average service / age at retirement under the 2020 assumptions
1987 Scheme Members (protected/tapered) (*)	Years of service	13,690	28.7	29.3	29.3
	Age	13,690	52.2	52.3	52.3
1987 Scheme Members (unprotected) (**)	Years of service	N/A	N/A	30.1	30.1***
	Age	N/A	N/A	55.1	55.1***
2006 Scheme Members (**)	Age	N/A	N/A	58.3	58.3
2015 Scheme Members (**)	Age	N/A	N/A	58.8	58.8

^{*} The 1987 scheme members (protected/tapered) experience reflects retirement ages 48 to 60 and service of 20 to 35 years and includes 197 tapered members and 23 unprotected members.

^{**} There was insufficient data to produce a robust analysis of retirements from the 1987 scheme (unprotected), 2006 scheme or the 2015 scheme.

^{***} The age/service that the member is expected to retire based on 1987 unprotected assumptions without any allowance for retire and rejoin.

Wider environment:

McCloud judgment

The McCloud judgment could result in many members exchanging up to 7 years' service from the 2015 scheme to the 1987/2006 schemes.

The additional service in the 1987 scheme may lead to earlier retirements than previously assumed. However, the magnitude of any change is by no means clear, if it occurs at all. There are many other factors that might be working in the other direction which may influence member behaviour including 'Retire and Rejoin' which is covered on the right.

As the majority of 2006 Scheme members are unprotected, and potential service built up shorter, there was no distinction between protected and unprotected members in the 2016 valuation assumptions. There is insufficient data on 2006 Scheme retirements to analyse the suitability of this assumption and therefore, we propose maintaining the existing retirement rates.

Retire and Rejoin

The 'Retire and Rejoin' option is currently being promoted to Police Officers in England & Wales.

This option enables 1987 Scheme members who are eligible to retire under the 1987 Scheme to access their 1987 Scheme lump sum whilst remaining in the 2015 Scheme for future service (having had a short break between retiring and rejoining).

We expect this to influence member behaviour significantly with members selecting this option and staying in service in the 2015 scheme until age 55 where they can retire on preferential terms from active status.

Normal Minimum Pension Age

The Finance Act 2022 sets out that the minimum age at which most pension scheme members can be permitted to draw their pension benefits will rise from 55 to 57 with effect from April 2028, to coincide with the rise of State Pension age to 67.

However, the normal minimum pension age for Police is not affected by this change, so we have made no allowance for this.

B5. Rates of leaving service



Rates of leaving service

What does this assumption represent?

Rates of leaving service (sometime referred to as withdrawal rates) are a series of probabilities which represent the likelihood of a member voluntarily leaving service (without retiring) at any given age.

Different assumptions are usually adopted for groups who are expected to behave differently, e.g. for males and females, or members with pensions in different sections of the scheme.

Summary statistics

Relative importance of assumption

Volatility of experience and unreliability of data

Volatility of Size of recommended changes on scheme costs

Large

Low

Large

Lower costs

Our recommendations and rationale

Withdrawals have been higher than previously assumed, so we recommend increasing the assumed rate of withdrawal for all members.

The higher rates of withdrawal continues a trend that was identified as part of the previous valuation in 2016 which considered experience between 2012 and 2016. For the 2016 valuation the 2012-2016 experience was considered to be unusual and unlikely to continue on the long term. However, based on 2016-2020 experience, withdrawals have remained at this increased level for another 4 year period.

We therefore propose to update and increase the withdrawal assumptions to be based upon the combined experience over 8 year period from 2012 to 2020 from when the higher rates were observed.

Indicative analysis suggests that this recommendation would materially reduce the employer contribution rate so therefore we have recommended updating for experience this valuation cycle.

The observed increase in leaving rates is also consistent with increased withdrawal rates observed across the public sector.

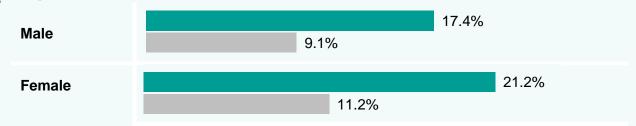
Practical implications

The chart to the right shows the likelihood of a member leaving service before retirement. For each category shown:

- The top line () shows the likelihood under the assumptions we recommend for the 2020 valuation.
- The bottom line () shows the likelihood under the assumptions adopted for the 2016 valuation.

The numbers shown assume that members either leave service or remain in service until age 55. No allowance is made for the possibility of early retirement, ill-health retirement, or death in service. These assumptions are covered in other sections.

Likelihood of leaving service before age 55 for member now aged 40



Our approach

Analysis

We have analysed the scheme's experience over the period 1 April 2012 to 31 March 2020.

We have included only those with two or more years' service.

Re-entry of members to pensionable service has been modelled by a 'net' withdrawal assumption for active members. This explicitly allows for a proportion of those leaving active service to return and is based on analysis undertaken on relevant member behaviour. No further explicit allowance has therefore been made in the valuation for a proportion of those deferred at the effective date to subsequently rejoin.

Setting recommended assumptions

Our general approach is:

- Compare recent withdrawal experience against the 2016 assumptions.
- Where there is enough scheme data we identify groups of members we would expect to have different rates of leaving service.
- Where there is not enough scheme experience, we look at assumptions from other groups of members or other schemes which may have similar experience, adjusted to allow for any available information.
- Recommend that the assumption is updated only if evidence points to a material change to the valuation results.
- We typically only recommend a change to the assumed number of withdrawals, leaving the age profile of the existing assumption unaltered. We only recommend a change to the age profile if we see evidence of a material and non-temporary step change in membership behaviour.
- The last four years of experience may not accurately reflect the longer-term, so if we recommend a change we generally 'smooth out' any excess volatility by basing our recommendation on an equal allowance for recent experience and the 2016 valuations assumptions, which were in turn considered pre-2016 experience.
- The withdrawal experience continues a trend that was identified as part of the previous valuation in 2016 but which was not updated for at that time. We have therefore based our analysis on experience over the 8 year period from 2012 to 2020, rather than from 2016 to 2020.

There were 4 forces excluded from the analysis, and this meant that the analysis was carried out on around 96% of active records.

Scheme experience: overall

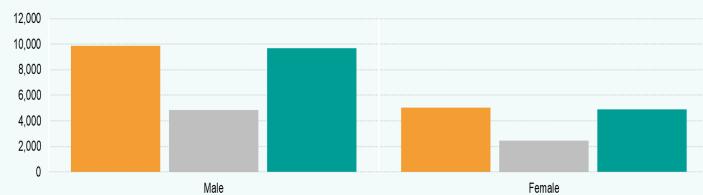
Experience versus expectations show how accurate the assumptions have been in the past and can help inform setting future assumptions.

The chart to the right and those on the following pages compare:

- actual experience () on the left what has happened over the last 8 years.
- 2016 assumptions () in the middle what we thought would happen, based on the assumptions adopted for the 2016 valuation.
- 2020 recommendations ()
 on the right what we would have expected to happen, had our recommended assumptions been adopted for the 2016 valuation.

It should be noted that experience can be a very volatile measure for groups with small amounts of data, which then impacts the reliance we place on it.

Experience vs expectations: number of leavers



The charts are based on 8 years experience (2012 to 2020) and only members with two or more years of service are included in the experience bar.

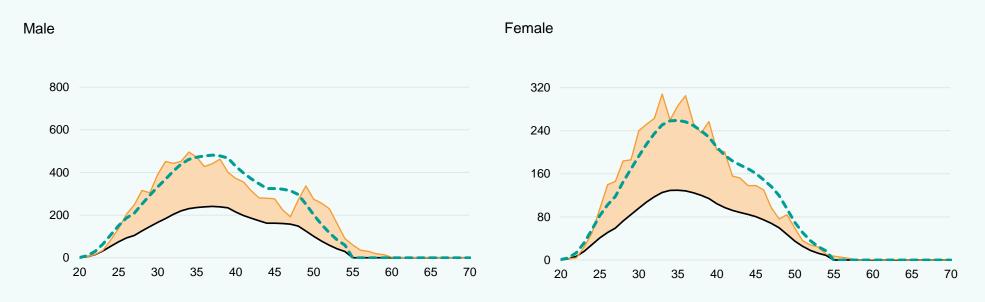
Summary

The chart above shows that there has been an increase in observed withdrawals compared to the 2016 assumptions. This follows a similar increase at the previous 2016 valuation. It is also in line with observations from other schemes of a general increase in withdrawals and indicative of a wider long-term trend across the public sector.

The charts on the next page show that the 2016 valuation assumed a lower level of withdrawals than have emerged in experience.

Scheme experience: in detail

Number of leavers by age, split by gender



The charts are based on 8 years experience (2012 to 2020) and only members with two or more years of service are included in the experience line.

Scheme experience: in numbers

Category	Experience Number of leavers over 2012-2020(*)	2016 Expectations Expected number of leavers under the 2016 assumptions (over 2012-2020 period)	2020 Expectations Expected number of leavers under the 2020 assumptions (over 2012-2020 period)
Male	9,867	4,842	9,865
Female	5,044	2,451	4,902

^(*) The analysis is based on 8 years experience (2012 to 2020) and only members with two or more years of service are included in the analysis.

B6. Promotional pay increases



Promotional pay increases

What does this assumption represent?

Promotional pay assumptions are a series of pay increases that members are assumed to receive in addition to normal annual salary increases. The assumptions are usually tied to a member's age or length of service.

Promotional pay increases are a 'scheme-set' assumption. Salary increases are a directed assumption and are not covered in this section.

Promotional pay increase assumptions are important as they help determine the value of 'final salary' benefits which make up a high proportion of scheme costs. The final salary proportion will reduce over time as more <u>CARE</u> benefits are built up in the reformed scheme, which are less dependent on promotional pay increases.

Costs of the <u>McCloud</u> remedy are highly sensitive to promotional pay increase assumptions.

Summary statistics

			Impact of recommended
Relative importance of	Volatility of experience	Size of recommended	changes on scheme
assumption	and unreliability of data	change	costs
Average	High	None	No impact
, were	9	110110	Gparet

Our recommendations and rationale

We recommend that the promotional pay increases assumptions adopted for the 2016 valuation are retained for the 2020 valuation.

For members with shorter service, experience has been more variable than assumed for the 2016 valuation but the overall experience has been broadly in line with the 2016 assumptions.

Adjusting the assumption for recent experience will not have a material effect on the valuation results.

Practical implications

The number and size of promotional pay increases can dramatically affect member benefits. This is especially true for final salary benefits (which are based on salary at retirement), but also true for career average benefits (which are based on earnings over a member's working lifetime in the scheme).

The chart to the right shows the potential salary at age 55 for a member currently aged 40 with 15 year's service and paid £30,000 a year.

For each category shown:

- The top line () shows the impact of the assumptions we recommend for the 2020 valuation.
- The bottom line () shows the impact of the assumptions adopted for the 2016 valuation.

General (non-promotional) salary increases are set to be zero in the chart so that the impacts of different promotional pay assumptions can be seen more clearly.

Salary at age 55 for a member now aged 40 with 15 years' service and paid £30,000



Our approach

Analysis

We have analysed the scheme's salary growth experience over the period 1 April 2016 to 31 March 2020 by identifying members who appear in the data used for both the 2016 and 2020 valuations and analysing their pay growth over the 2016-2020 period. This is known as an "annual increase" analysis.

We have stripped out an allowance for known general pay increases in order to isolate the promotional elements of pay changes.

We have made no allowance for members moving between categories.

Setting recommended assumptions

Our general approach is:

- Identify groups of members we would expect to have different levels of promotional increases.
- Compare recent levels of promotional increases against the 2016 valuation assumptions
- Where there is not enough scheme experience, we look at assumptions from other groups of members or other schemes which may have similar experience, adjusted to allow for any available information.
- Recommend a change to the assumption only if evidence points to a material change to the valuation results.
- We typically only recommend an overall adjustment to the assumed promotional increases, leaving the age profile of the existing assumption unaltered. We only recommend a change to the age profile if we see evidence of a material and nontemporary change in membership behaviour.
- The last four years of experience may not accurately reflect the longer-term, so if we recommend a change we generally 'smooth out' any excess volatility by basing our recommendation on an equal allowance for recent experience and the 2016 valuations assumptions, which were in turn set using pre-2016 experience.

No forces were excluded from the promotional pay analysis.

Scheme experience: overall

Experience versus expectations show how accurate the assumptions have been in the past and can help inform setting future assumptions.

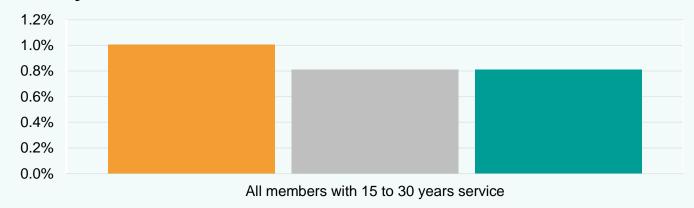
The chart to the right and those on the following pages compare:

- actual experience () on the left what has happened over the last 4 years.
- 2016 assumptions () in the middle what we thought would happen, based on the assumptions adopted for the 2016 valuation.
- 2020 recommendations ()
 on the right what we would have expected to happen, had our recommended assumptions been adopted for the 2016 valuation.

All numbers exclude general (non-promotional) salary increases.

It should be noted that experience can be a very volatile measure for groups with small amounts of data, which then impacts the reliance we place on it.

Experience vs expectations: average annual increases over 15 to 30 years service



Summary

Overall, members have experienced higher promotional pay increases than expected, based on the 2016 assumptions.

The differences are larger, and more variable, for members with shorter service periods but the shape of the experience is broadly in line with the 2016 assumptions. The removal of some of the pay points for constables in 2015 and 2016, following the Windsor review, is the likely driver for the higher increases for those with shorter service periods.

Adjusting the assumptions for recent experience would not be expected to have a material impact on the valuation results.

Scheme experience: in detail

Annual promotional pay increases by service

All Members



Scheme experience: in numbers

Category	2016 payroll of analysed members	2020 payroll of analysed members	Experience Implied annual promotional pay increase, after removal of general salary increases	2016 Expectations Expected annual promotional pay increase under the 2016 assumptions	2020 Expectations Expected annual promotional pay increase under the 2020 assumptions
All Members	£3.4 billion	£3.6 billion	1.0%	0.8%	0.8%

The 2016 payroll figures above include an allowance for known general pay increases from 2016 to 2020 and includes all members with all years of service. The Experience and Expectations figures shown in the table above show the annual promotional pay increases for all members with 15 to 30 years service. Different rates would apply for different service periods.

B7. Rates of ill-health retirement



Rates of ill-health retirement

What does this assumption represent?

Rates of ill-health retirement are a series of probabilities which represent the likelihood of a member retiring in ill-health at any given age.

Members are eligible for either upper-tier or lower-tier ill-health benefits, depending on the severity of their illness.

Summary statistics

Relative importance of assumption

Volatility of Size of recommended changes on scheme costs

Least

Low

None

No impact

Our recommendations and rationale

Ill-health incidence: Ill-health retirements have been slightly below the rates previously assumed. In any case adjusting the assumption for recent experience will not make a material change to the valuation results, so we recommend that the 2016 assumptions are retained.

Our experience runs to 31 March 2020, and as such misses most of the impact of COVID-19. There is anecdotal evidence that COVID-19 has increased the number of ill-health retirements, which supports retaining the current assumption.

Split between ill-health tiers: There has been a higher proportion of upper tier than previously assumed retirements. However, we suspect that many authorities may have only recorded higher tier ill health retirements and would expect at least some lower tier retirements, so we have doubt with regards to the quality of the data. Therefore, we propose to maintain assumption for the split for higher / lower tiers at 50:50 despite the experience of a larger proportion of higher tier retirements.

We would not expect the <u>McCloud</u> judgment to impact the number of ill-health retirements directly. However, the tests for the eligibility of members to receive ill-health benefits differs between the legacy and reformed schemes. We would not expect this to have a material impact on future contribution rates as the legacy arrangements ceased on 1 April 2022.

Practical implications

The chart to the right shows the likelihood of members retiring in ill-health before retirement. For each category shown:

- The top line () shows the likelihood under the assumptions we recommend for the 2020 valuation.
- The bottom line () shows the likelihood under the assumptions adopted for the 2016 valuation.

The numbers shown assume that members either retire in ill health or remain in service until age 55. No allowance is made for the possibility of early retirement, leaving service, or death in service. These assumptions are covered in other sections.

Likelihood of member now aged 40 retiring in ill-health before age 55



Our approach

Analysis

We have analysed the scheme's experience over the period 1 April 2016 to 31 March 2020.

As ill-health criteria sometimes differ between schemes, there is a chance that experience might have been slightly different if members in scope for the McCloud remedy were in a different scheme to currently. We expect the overall impact of this to be immaterial and have made no allowance for this possibility.

Setting recommended assumptions

Our general approach is:

- Identify groups of members we would expect to have different rates of ill-health retirement, for example by gender, where there is enough scheme experience data available.
- Compare recent ill-health retirement experience against the 2016 assumptions.
- Where there is not enough scheme experience, we look at assumptions from other groups of members or other schemes which may have similar experience, adjusted to allow for any available information.
- Recommend that the assumption is updated only if evidence points to a material change to the valuation results.
- We typically only recommend a change to the assumed number of ill-health retirement, leaving the age profile of the existing assumption unaltered. We only recommend a change to the age profile if we see evidence of a material and nontemporary step change in membership outcomes.
- The last four years of experience may not accurately reflect the longer-term, so if we recommend a change we generally 'smooth out' any excess volatility by basing our recommendation on an equal allowance for recent experience and the 2016 valuations assumptions, which were in turn set using pre-2016 experience.
- The same approach applies to the proportions of ill-health retirements across the different severity tiers.

There were 4 forces excluded from the analysis, and this meant that the analysis was carried out on around 96% of active records.

Scheme experience: overall

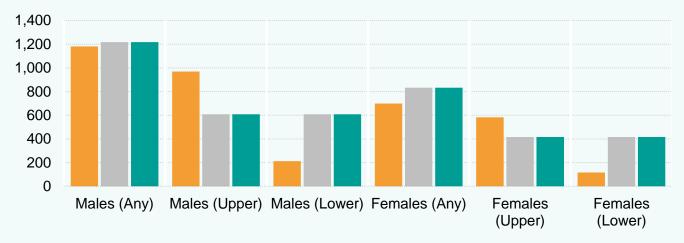
Experience versus expectations show how accurate the assumptions have been in the past and can help inform setting future assumptions.

The chart to the right and those on the following pages compare:

- actual experience () on the left what has happened over the last 4 years.
- 2016 assumptions () in the middle what we thought would happen, based on the assumptions adopted for the 2016 valuation.
- 2020 recommendations ()
 on the right what we would have
 expected to happen, had our
 recommended assumptions been
 adopted for the 2016 valuation.

It should be noted that experience can be a very volatile measure for groups with small amounts of data, which then impacts the reliance we place on it.

Experience vs expectations: number of ill-health retirements



Summary

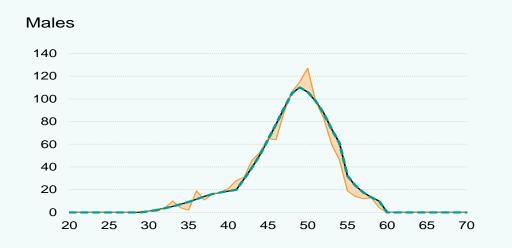
The charts above show that there have been fewer ill-health retirements compared to the 2016 assumptions.

The charts on the next page show that the age profile of the recent retirements broadly match the 2016 assumptions.

We separately considered the ill-health tiers. For the 2016 valuation 50% of members were assumed to retire with upper-tier benefits when leaving due to ill-health. Our analysis identified that around 83% of actual retirements were with upper-tier benefits. However, we have doubts with the quality of the data from some regions. Therefore, we propose to maintain the assumption for the split for higher / lower tiers at 50:50 despite the experience of a larger proportion of higher tier retirements.

Scheme experience: in detail

Number of ill-health retirements by age, split by category





Scheme experience: in numbers

Category		Experience Number of ill-health retirements over 2016-2020	2016 Expectations Expected number of ill-health retirements under the 2016 assumptions	2020 Expectations Expected number of ill-health retirements under the 2020 assumptions
	Any	1,180	1,217	1,217
Males	Upper	968	609	609
	Lower	212	609	609
	Any	699	833	833
Females	Upper	583	416	416
	Lower	116	416	416

Wider environment: McCloud

McCloud judgment

We would not expect the <u>McCloud</u> judgment to impact the number of ill-health retirements directly. However, the tests for the eligibility of members to receive ill-health benefits can differ between the legacy and reformed schemes.

Therefore, there may be an increased rate of ill-health retirement for in scope members, who may be reassessed under different rules. We would not expect this to have a material impact on contribution rates.

In addition, this ceased to apply from 1 April 2022 when all members moved into the reformed scheme.

B8. Mortality before retirement



Mortality before retirement

What does this assumption represent?

Mortality assumptions are a series of probabilities which represent the likelihood of a member dying at any given age. Different assumptions usually apply to males and females.

Mortality after retirement assumptions will be used after members are assumed to retire and these are covered in Part B2.

Summary statistics



Our recommendations and rationale

Deaths before retirement experience has been reasonably close to the 2016 assumptions, so we recommend no changes to the current assumptions.

The analysed experience runs to 31 March 2020, and as such misses most of the impact of COVID-19. There is anecdotal evidence that COVID-19 has increased the number of deaths before retirement. However, we have made no allowance for this, as it is unlikely to have any material impact on the valuation results.

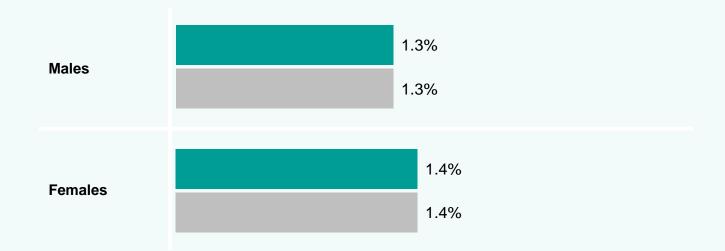
Practical implications

The chart to the right shows the likelihood of dying before retirement. For each category shown:

- The top line () shows the likelihood under the assumptions we recommend for the 2020 valuation.
- The bottom line () shows the likelihood under the assumptions adopted for the 2016 valuation.

The numbers shown assume that members either die or remain in service until age 55. No allowance is made for the possibility of early retirement, leaving service, or ill-health retirement. These assumptions are covered in other sections.

Likelihood of member now aged 40 dying in service before age 55



Our approach

Analysis

We have analysed the scheme's preretirement mortality experience over the period 1 April 2016 to 31 March 2020.

Setting recommended assumptions

Our general approach is:

- Identify groups of members we would expect to have different rates of death before retirement, for example by gender.
- Compare recent pre-retirement death experience against the 2016 assumptions.
- Where there is not enough scheme experience, we look at assumptions from other groups of members or other schemes which may have similar experience, adjusted to allow for any available information.
- Recommend that the assumption is updated only if evidence points to a material change to the valuation results.
- We typically only recommend a change to the assumed number of pre-retirement deaths, leaving the age profile of the existing assumption unaltered. We only recommend a change to the age profile if we see evidence of a material and nontemporary step change in membership outcomes.
- The last four years of experience may not accurately reflect the longer-term, so if we recommend a change we generally 'smooth out' any excess volatility by basing our recommendation on an equal allowance for recent experience and the 2016 valuations assumptions, which were in turn set using pre-2016 experience.

There were 4 forces excluded from the analysis, and this meant that the analysis was carried out on around 96% of active records.

Scheme experience: overall

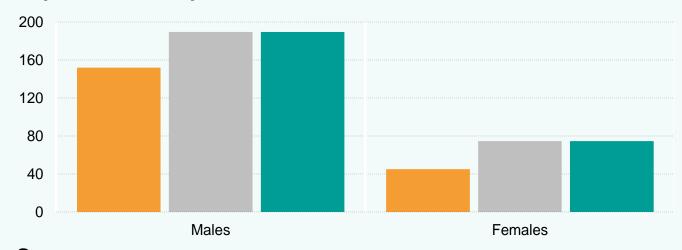
Experience versus expectations show how accurate the assumptions have been in the past and can help inform setting future assumptions.

The chart to the right and those on the following pages compare:

- actual experience () on the left what has happened over the last 4 years.
- 2016 assumptions () in the middle— what we thought would happen, based on the assumptions adopted for the 2016 valuation.
- 2020 recommendations () on the right what we would have expected to happen, had our recommended assumptions been adopted for the 2016 valuation.

It should be noted that experience can be a very volatile measure for groups with small amounts of data, which then impacts the reliance we place on it.

Experience vs expectations: number of deaths before retirement



Summary

The charts above show that there have been fewer pre-retirement deaths compared to the 2016 assumptions. The charts on the next page show that the age profiles of the recent deaths broadly match the 2016 assumptions.

As with the 2016 valuation, there has been a relatively small number of pre-retirement deaths.

The analysed experience runs to 31 March 2020, and as such misses most of the impact of COVID-19. It is accepted that COVID-19 increased the number of deaths before retirement. However, we have made no allowance for this, as it is unlikely to have any material impact on the valuation results.

Scheme experience: in detail

Deaths before retirements by age, split by category





Scheme experience: in numbers

Category	Experience Number of deaths in service over 2016-2020	2016 Expectations Expected number of deaths in service under the 2016 assumptions	2020 Expectations Expected number of deaths in service under the 2020 assumptions
Males	152	190	190
Females	45	75	75

B9. Family statistics



Family statistics

What does this assumption represent?

The term 'family statistics' covers several assumptions, including:

- the probability that an eligible partner exists
- the average age of that partner, compared to the member.

The assumptions are used to estimate the likelihood of a dependant's pension coming into payment when a member dies, and how long that pension will be paid.

For existing pensioners, we consider the likelihood of members having an eligible partner on 31 March 2020. For future pensioners, we consider the likelihood of members having an eligible partner at retirement, or earlier death.

Mortality assumptions apply independently to the member and assumed partner.

Summary statistics

•	Volatility of experience and unreliability of data		Impact of recommended changes on scheme costs
Least	Medium	None	No impact

Our recommendations and rationale

Proportion Married/Partnered: For the current pensioner proportion married assumptions (applicable to 1987 scheme members), we recommend no change to the 2016 assumptions. The analysis only covers 8 out of 45 forces (around 40% of members) which limits the credibility of the analysis. Also, there has been no consistent trend in the movement data compared to the 2016 valuation.

For the current pensioner proportion married/partnered assumptions (applicable to 2006 scheme and 2015 scheme members), we recommend no change to the 2016 assumptions. There are too few deaths arising from the 2006 scheme and 2015 scheme to test the suitability of this assumption, so we looked to the ONS married and married/partnered assumptions to inform our recommendation.

For the future pensioner proportion married and married/partnered assumptions, we recommend no change to the 2016 assumptions.

Age difference assumptions: For the age difference assumptions, we recommend no change to the 2016 assumptions. This is due to experience being broadly in line with the current 2016 assumptions.

Other assumptions: For the minor assumptions such as minor dependants' pensions, dependants' gender and remarriage, we recommend no change to the 2016 assumptions.

Practical implications

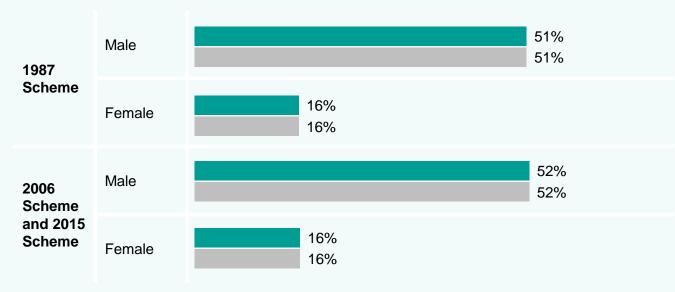
The chart to the right shows the likelihood that an eligible partner exists when a member dies. The likelihoods shown depend on:

- Assumptions about the existence of an eligible partner and that partner's age (discussed in this section).
- Assumptions about the member and partner's mortality (discussed in the mortality after retirement section).

For each category shown:

- The top line () shows the likelihood under the assumptions we recommend for the 2020 valuation.
- The bottom line () shows the likelihood under the assumptions adopted for the 2016 valuation.

Likelihood of an eligible partner existing at time of death*, for normal health pensioner who retired at age 55



^{*}Assumed age at death for normal health male pensioners is 86 and for females is 88, using the life expectancy assumptions we recommend for the 2020 valuation.

Our approach

Analysis

We have analysed the scheme's experience over the period 1 April 2016 to 31 March 2020.

Our analysis has been carried out on a 'lives' basis reflecting data available.

Setting recommended assumptions

Our general approach is:

- Identify groups of members we would expect to have different family statistics, for example by gender, and by section of the scheme, where there are differences in eligibility.
- Compare recent proportion married for members against the 2016 assumptions.
- Where there is not enough scheme experience, we look at assumptions from national statistics, other groups of members or other schemes which may have similar experience, adjusted to allow for any available information.
- Recommend that the assumption is updated only if evidence points to a material change to the valuation results.
- Recommend that the proportion married/partnered assumption remains aligned to the proportion married assumption in the absence of any experience data or evidence that would justify changing the proportion married/partnered assumption.
- We typically only recommend a change to the overall assumed proportion married or married/partnered, leaving the age profile of the existing assumption unaltered. We only recommend a change to the age difference if we see evidence of a material and non-temporary step change in membership behavior.
- The last four years of experience may not accurately reflect the longer-term, so if we
 recommend a change we generally 'smooth out' any excess volatility by basing our
 recommendation on an equal allowance for recent experience and the 2016 valuations
 assumptions, which were in turn set using pre-2016 experience.

We have analysed 8 out of 45 forces (around 40% of member records).

Scheme experience: overall

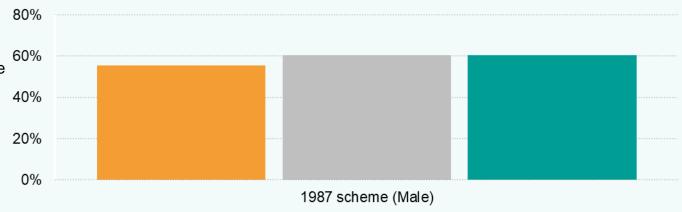
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 on the right what we would have expected to happen, had our recommended assumptions been adopted for the 2016 valuation.

It should be noted that experience can be a very volatile measure for groups with small amounts of data, which then impacts the reliance we place on it.

Experience vs expectations: proportion married at death



Summary

The 1987 scheme, for males, has seen a similar proportion married in recent years compared to the 2016 assumption, as shown above. However, as the analysis only covers 8 out of 45 forces (around 40% of members) this limits the credibility of the data analysis. There is insufficient information to carry out any analysis for females.

There is insufficient information compare experience against the 2006 scheme and 2015 scheme proportion married/partnered assumption, due to low rates of deaths. However, ONS married and married/partnered statistics were considered when informing whether the married/partnered assumption remained appropriate. The ONS data supported no change to the gap between the married and married/partnered assumption.

Scheme experience: in detail

Proportion married at death by age

1987 scheme males



Scheme experience: in numbers

Proportion married or married/partnered at death, by category

Categor	ту	Experience Number of member deaths over 2016-2020	Experience Actual number of dependant's pension coming into payment over 2016-2020, as a percentage of how many could have come into payment if every member who died had an eligible dependant	2016 Expectations Expected proportion married or partnered at death under the 2016 recommendations	2020 Expectations Expected proportion married or partnered at death under the 2020 recommendations
Mala	1987 scheme (*)	3,600	55%	61%	61%
Male	2006 scheme and 2015 scheme (**)	N/A	N/A	85%	85%

^{*}There were 132 female deaths, which is insufficient data to analyse. Female deaths are not included in the table above. There is 1 death from 2006 and 2015 that has been included in the 1987 scheme analysis.

^{**}There was 1 male member death over 2016-2020 from the 2006 scheme and 2015 scheme which is insufficient data to produce a robust analysis.

Scheme experience: overall

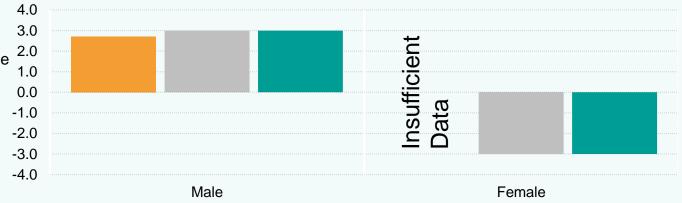
Experience versus expectations show how accurate the assumptions have been in the past and can help inform setting future assumptions.

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It should be noted that experience can be a very volatile measure for groups with small amounts of data, which then impacts the reliance we place on it.

Experience vs expectations: age difference at death



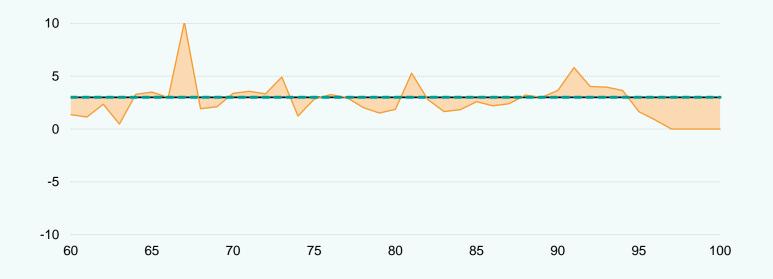
Summary

The charts above show that for males the actual average age difference between member and spouse at death has been a slightly smaller differential in recent years compared to the 2016 assumption. However, the data set underlying the charts is relatively small and therefore the experience data is not likely to be credible for justifying any change to the assumption and therefore, is provided for information only.

Scheme experience: in detail

Age difference between member and spouse or partner by age

1987 Scheme Males



Scheme experience: in numbers

Age difference between member and spouse or partner, by category

Category	Experience Number of member deaths over 2016-2020	Experience Average age difference between member and eligible spouse or partner at date of death (**)	2016 Expectations Expected age difference between member and eligible partner or spouse under the 2016 assumptions	2020 Expectations Expected age difference between member and eligible partner or spouse under the 2020 assumptions
Male	1,997	2.7	3	3
Female (*)	34	-0.9	-3	-3

^(*) There was insufficient data to produce a robust analysis and therefore, the output included in the table above is for information only.

^(**) The average age difference is weighted by total deaths resulting in an adult dependant pension.

Wider environment:

Walker & Goodwin

The Goodwin legal challenge was brought against The Department for Education (DfE) in respect of survivor's benefits provided in the Teachers' Pension Scheme. The Goodwin challenge follows on from the Walker case (which ruled in 2017 that to treat same-sex spouses/civil partners less favourably than their opposite-sex equivalents constituted unlawful discrimination). TPS provided survivor's benefits to male widowers of female members based on service from 6 April 1988, whereas same-sex partners of male members were provided benefits based on service from 1 April 1972 (or 6 April 1978 if the marriage was after the last day pensionable service). Some other public service schemes have similar provisions and we previously identified that this could have a material effect for those schemes.

The Government announced in July 2020 that it had concluded that changes are required to the Teachers' Pension Scheme (England & Wales) to address this discrimination. The government believes this difference in treatment will also need to be remedied in other UK public service pension schemes with similar provisions.

However, we have previously been advised by the Home Office that Goodwin does not affect the Police scheme, so no adjustment is required to the analysis.

Minor dependants' pensions

No allowance has been taken for short term dependants' pensions or childrens' pensions (other than those already in payment), on grounds of immateriality.

Dependants' gender

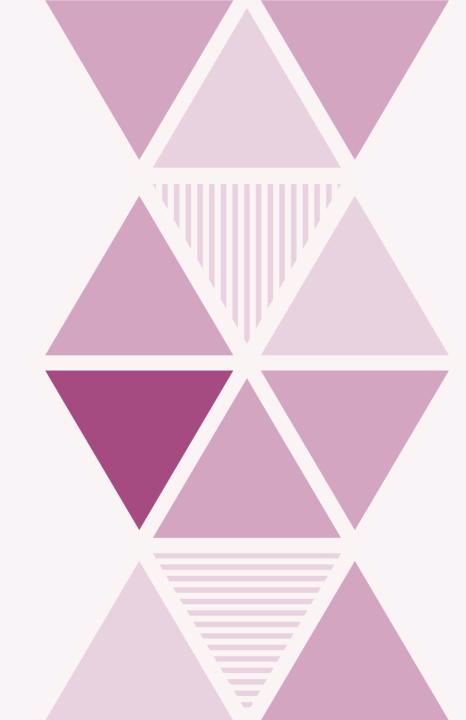
All dependants are assumed to be the opposite sex of the member, on the grounds of materiality.

Remarriage

No allowance is made for remarriage on the grounds of materiality.

In each case, the approach is the same as that adopted for the 2016 valuation.

Part C: Appendices



C1. Directed assumptions 1

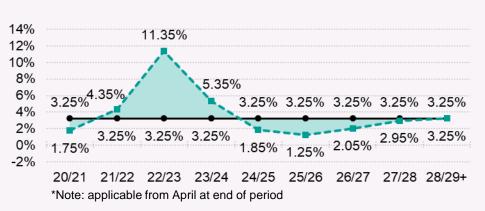
Annual financial assumptions

Taken from Directions dated 30 August 2023.

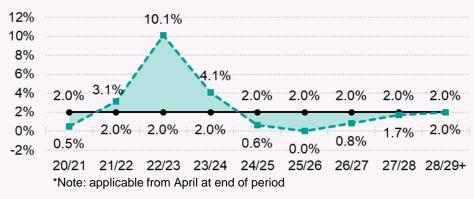
Discount rate, net of assumed pension increases



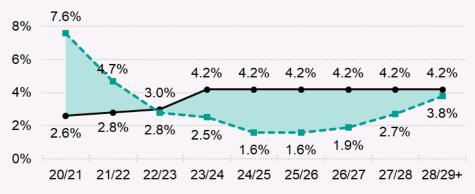
Rates of CARE revaluation



Rates of pension increases



Rates of salary increases



Key: — 2016 assumptions



C1. Directed assumptions 2

Other directed assumptions

Taken from Directions dated 30 August 2023.

Assumption name	2016 assumption	2020 assumption
Deficit spreading periods	15 years	15 years
Future mortality improvements	In line with 2016-based ONS projections	In line with 2020-based ONS projections
State Pension ages	As legislated for in the Pensions Act 1995, Pensions Act 2007, Pensions Act 2011 and Pensions Act 2014	As legislated for in the Pensions Act 1995, Pensions Act 2007, Pensions Act 2011 and Pensions Act 2014

C2. Other minor assumptions 1

Active membership projections

<u>Direction</u> 12 requires the actuary to use the 'projected unit methodology' to calculate the valuation results. The valuation results require the calculation of the cost of benefit accrual over periods after the effective date (31 March 2020). This implicitly requires the actuary to estimate the membership to future dates in order to determine the valuation results.

Members of the legacy schemes ceased to accrue benefits in these schemes at 31 March 2022 and future accrual for all members is in the reformed scheme from 1 April 2022.

The expected cost of accruing benefits over periods after the effective date have been determined by assuming an overall stable population (age and pay profile) to the end of implementation period.

The approach incorporates the following assumptions:

- Members with past service in the legacy schemes are assumed to retire in line with recent experience. This provides for some legacy scheme members to remain in active service in the reformed scheme beyond 2022 due to late retirement.
- The overall profile of the membership in terms of average age and pay distribution is assumed to remain constant over the period.
- The overall active membership will be in receipt of pensionable pay for each relevant year equal to that assumed for forecasting purposes.
- The State Pension age in the projected populations is assumed to be determined by the implied dates of birth and so the State Pension age mix changes over time despite the assumed stable population. This allows for the membership accruing benefits to change over the implementation period.
- Mortality is assumed to be projected forward to the relevant year of use in all cases.

C2. Other minor assumptions 2

Grouping of individual active member records

Individual active members have been grouped together for the purposes of calculating liabilities. This grouping is necessary to accommodate the volume of data within our valuation system. The approach taken to grouping the data has been tested to ensure it does not result in any distortion of the valuation results. The groupings are made for each scheme (i.e. 1987, 2006 or 2015), previous protection status (i.e. protected, tapered or unprotected) and based on the following criteria.

· Age: age nearest

Service: duration (years nearest)

Payroll projection

For the purposes of spreading any past service surplus or deficit, the future payroll for each of the years over 15 years from 1 April 2024 are projected from the salaries provided at the valuation date in line with valuation earnings assumptions.

Member contribution yield over implementation period

Members contribute to the cost of their pensions by paying a proportion of their pensionable salaries to the scheme. The contribution rates paid by members are determined by the band in which their full time equivalent annual earnings lie.

The target member contribution rate of the scheme, on average, is 13.7% of pensionable pay.

The Home Office plans to consult with stakeholders on the future structure of member contributions payable to the scheme. For the purposes of the 2020 valuation, we have been instructed by the Home Secretary to assume that contributions received into the scheme will align with the target member contribution rate.

C2. Other minor assumptions 3

McCloud calculation approach

The outcome of the remedy required to address the <u>McCloud</u> judgement is twofold:

- When benefits become payable, eligible members can select to receive them from either the <u>reformed or legacy</u> <u>schemes</u> for the period 1 April 2015 to 31 March 2022.
- All active members still in the legacy scheme were transferred to the reformed scheme from 1 April 2022.

Members are likely to choose the option that provides them with the highest benefits.

For the Police Pension Scheme (England & Wales) we have assumed that the <u>legacy scheme</u> benefits are better for all eligible individual members in the 31 March 2020 data.

Benefits are valued in each contingency (eg retirement or death), at each future date and for each eligible individual, using the same demographic assumptions (eg retirement ages) for both the <u>reformed and legacy section</u> calculations.

This approach differs from the approach taken for the Cost control valuation as at 31 March 2016 Cost Cap valuation report dated 6 January 2022. The approach for the 2020 valuation is required to be accurate because it impacts on Employer contributions from 1 April 2024. A simplified approach was taken to the 2016 Cost Cap valuation because the conclusion that there was no floor breach would not have been impacted by any refinements to the calculation approach.

C3. Glossary 1

CARE	CARE stands for Career Average Revalued Earnings and refers to a methodology whereby earnings over a member's working lifetime in the scheme are used in the calculation of their benefits in the reformed scheme.
CARE revaluation	The rate at which the CARE pension is revalued each year a member is an active member.
Cost cap cost (CCC)	A measure of the cost of benefits being provided from the reformed scheme, which is then compared to a 'target cost'. The Police Pension Schemes (England & Wales) target cost is set at 12.8% of pay. If the results of the valuation show that the cost cap cost is more than 3% of pensionable pay away from the target cost, and the cost of the scheme still results in a breach once the impact of the economic check is taken into account, changes must be made to the reformed scheme (e.g., to the benefits provided) to bring the cost cap cost back to the target cost.
Directions	A document published by HM Treasury and referred to in the Public Service Pensions Act 2013, which sets out the process and requirements for carrying out valuations, including the results which need to be disclosed. Directions were first published in 2014 and have been amended several times since then.
Employer contribution rates (ECR)	 The percentage of scheme members' pensionable salaries which employers are required to pay in order to: meet the costs of benefits currently being built up by active members make good any shortfall in the notional amounts set aside to cover benefits already built up. The result is heavily dependent on assumptions about future financial conditions and membership changes.

C3. Glossary 2

McCloud	McCloud refers to a legal judgment made in December 2018. The England and Wales Court of Appeal judgment upheld claims of age discrimination brought by some firefighters and members of the judiciary against 'transitional protection' rules. These rules determined the date on which some members would move between reformed and legacy sections of the scheme.	
Normal pension age	 The age at which a member in normal health is entitled to unreduced benefits. This age varies between the schemes: 1987 Scheme After 30 years' service at any age, or after 25 years' service at age 50 and above, or otherwise at age 55 (some senior officers have higher retirement ages); Deferred pension age 60 2006 Scheme Age 55; Deferred pension age 65 2015 Scheme Age 60, with flexible retirement from age 55 subject to benefits being actuarially reduced; Deferred pension age equal to State Pension Age (SPA) with a minimum of age 65. 	
Pension increase	Public service pensions are increased under the provisions of the Pensions (Increase) Act 1971 and Section 59 of the Social Security Pensions Act 1975.	
Professional actuarial requirements	 The professional requirements that we have complied with when completing this actuarial valuation include: Technical Actuarial Standards: TAS 100 and TAS 300, issued by the Financial Reporting Council (FRC) The Actuaries' Code, issued by the Institute and Faculty of Actuaries (IFoA) The Civil Service Code. GAD is also accredited under the IFoA's Quality Assurance Scheme. More details can be found in our terms of reference. 	

C3. Glossary 3

Reformed and legacy sections	The reformed section of the scheme is the section that was set up in line with the Public Service Pensions Act 2013, and which came into force on 1 April 2015. All non-reformed sections are known as legacy sections. This terminology is used in the McCloud judgment.
Police Advisory Board	The Board set up in line with section 7 of the Public Service Pensions Act 2013, with responsibility for providing advice on potential changes to the scheme and other matters relating to the efficient administration and management of the scheme.
Standard table	The standard tables used for the mortality after retirement assumption are the SAPS tables. These are published by the Continuous Mortality Investigation (CMI) and based on the experience of defined benefit self-administered pension schemes. The 'S2' series are based on experience over the period 2004 to 2011. The S3 series of tables were published by CMI in December 2018 and these updated mortality tables cover experience between 2009 and 2016. The S3 series include tables for pensioners retiring in normal health (S3NXA), in ill health (S3IXA) and all pensioners (S3PXA), as well as for dependants (S3DXA). The tables are also split into "Heavy", "Middle", "Light" and "Very Light" subsets according to pension amount, as well as a table covering all amounts. The "Very Light" tables reflect the highest pension amounts.